

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiffs,

No. 19-cv-10750

v

HON. PAUL D. BORMAN

DAMIAN JACKSON, HOLLY JACKSON,
STREAMLINE PROPERTY SOLUTIONS,
LLC, SABO ACCEPTANCE CORP,
MACOMB COUNTY, MICHIGAN, and
STATE of MICHIGAN,

Defendants.

JAMES STRANDJORD
Attorney for Plaintiffs
U.S. Department of Justice-Tax Division
P.O. Box 55
Ben Franklin Station
Washington, DC 20044-0055

Moe Freedman (P74224)
Attorney for Defendants
Michigan Department of Attorney General
State of Michigan
SCFRA & Collections Division
3030 W. Grand Blvd, Ste 10-200
(313)-456-0140

ANSWER TO COMPLAINT

Defendant, State of Michigan, Michigan Department of Treasury, through its attorneys, DANA NESSEL, Michigan Attorney General, and Moe Freedman, Assistant Attorney General, answers as follows:

1. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

2. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

3. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

4. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

5. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

6. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

7. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

8. The Michigan Dept of Treasury states that it does hold an interest in the real property of Damian Jackson through notices of tax liens filed with the Macomb County Register of Deeds, namely, Notice of Tax Lien No. 1949219 for unpaid State of Michigan income tax that was assessed on June 20, 2016, and Notice of Tax Lien No. 1955397 for past due State of Michigan income taxes that were assessed October 7, 2016.

9. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

10. This allegation does not require a response.

11. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

12. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

13. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

14. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

15. This allegation does not require a response.

16. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

17. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

18. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

19. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

20. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

21. This allegation does not require a response.

22. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

23. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

24. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

25. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

26. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

27. This allegation does not require a response.

28. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

29. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

30. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

31. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

32. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

33. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

34. This allegation does not require a response.

35. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

36. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

37. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

38. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

39. This allegation does not require a response.

40. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

41. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

42. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

43. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

44. The Michigan Dept of Treasury has no information with regard to this allegation so neither admits nor denies the allegation.

45. The Michigan Dept of Treasury has no information with regard to this allegation and therefore neither admits nor denies this allegation.

Therefore, the Michigan Department of Treasury request that the Court give its interest in the real property interest of Damian Jackson it's appropriate treatment in any action taken by Court through this action.

Respectfully submitted,

DANA NESSEL
Attorney General


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Dated: May 9, 2019